DATE:

May 11, 1989

TO:

See Below

FROM:

Brian Martin

SUBJECT:

LPC #1630450038 -- St. Clair County

US EPA RECORDS CENTER REGION 5

E. St. Louis/Wastex Superfund/Enforcement

Section 4(Q) Notice

Attached is the Section 4(Q) Notice for the Wastex property in East St. Louis, Illinois. This document is ready for the Director's signature.

If you agree with the recommendation that Director Killian sign this document, please so indicate below and forward to the next person on the list. If you believe a briefing with the Director is necessary, please let me know and I will arrange it.

	CONCUR	DATE	REQUEST BRIEFING
Brian Martin,	Jim.	5/15/89	
Project Manager Jim Janssen	900	5/15/89	
Jim Frank		5/17/29	
Bruce Carleson	B.C.	5/15/89	
 dary King			
Bharat Mather	1971	517-89	
Bill Child	wice	5-19-89	
Roger Kanerva	10k	5/22/29	
Bernard Killian	BYL	5/22/89	

Attachment

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF:

WASTEX RESEARCH SITE, EAST ST. LOUIS, ILLINOIS EPA FILE NO. 8663-HAZ

ALLWASTE TANK CLEANING SERVICES, INC., a Georgia corporation, BARRY-WEHMILLER COMPANY, a Missouri corporation. BELLEVILLE SHOE MANUFACTURING COMPANY, a Delaware corpo-) ration, BROWN GROUP, INC., a New York corporation, BULL MOOSE TUBE COMPANY, a Missouri corporation, CARGILL, INC., a Delaware corporation, CHANNAHON SEPTIC SERVICE. a business entity, CHARLES JOHNSON COMPANY, a business entity, CHEMICAL WASTE MANAGEMENT, INC., a Delaware corporation, CHEMSICO, INC., a Delaware corporation, CHRYSLER CORPORATION, a Delaware corporation, COALIQUID, INC., a Kentucky corporation, COLGATE-PALMOLIVE COMPANY, an Indiana corporation, CONTINENTAL CAN COMPANY, INC., à) Delaware corporation, DCE, INC., a Kentucky corporation. DEHART PAINT & VARNISH COMPANY, a Kentucky corporation, DENNIS CHEMICAL COMPANY, INC., a Missouri corporation, DON WHITE OIL SERVICE, INC., an Iowa corporation, E.G. COMPOSITES, INC., an Indiana corporation, ENRAC CHEMI-CAL, a business entity, ENVIRONMENTAL INTERNATIONAL, a Kansas corporation, FORD MOTOR COMPANY, a Delaware corporation, FRUEHAUF CORPORATION, a Michigan corporation, HERR OIL PRODUCTS, INC., an Iowa corporation, HUSKY CORPORATION, a Missouri corporation, HUSSMANN REFRIGER-ATION, INC., a Missouri corporation, INDEPENDENT TANK CLEANING SERVICES, INC., a Georgia corporation, INDIANA DEPARTMENT OF HIGHWAYS, an agency of the State of Indiana, INMONT CORPORATION, an Ohio corporation, JEF-FERSON CITY TOOL COMPANY, an Ohio corporation, JONES CHEMICALS, INC., an Indiana corporation, KENTUCKY COR-RECTIONAL INDUSTRIES, an agency of the State of Kentucky, KISTER LUMBER COMPANY, a business entity, LEGGETT & PLATT, INC., a Kentucky corporation, LOUISVILLE GOLF CLUB COMPANY, a Kentucky corporation, THE MARLEY COOLING) TOWER COMPANY, a Kentucky corporation, MCGREW COLOR GRAPHIC, a business entity, MCKNIGHT CHEMICAL COMPANY, a Missouri corporation, METAL DECORATING COMPANY, a business entity, MID SOUTH PAINTING, a business entity, MIDLAND COLOR COMPANY, a Delaware corporation, MISSOURI DEPARTMENT OF CORRECTIONS, an agency of the State of Missouri, MISSOURI HIGHWAY DEPARTMENT, an agency of the State of Missouri, MOBIL OIL CORPORATION, a New York corporation, MUECK AUTO BODY COMPANY, a Missouri corpo-) ration, MULTI-METALS COMPANY, a business entity, NATIONAL ENVELOPE CORPORATION - MIDWEST, a Kansas corpo-) ration, THE ORCHARD CORPORATION OF AMERICA, a Missouri) corporation, PAN AMERICAN INDUSTRIES, INC., a Missouri

corporation, PAPER ART COMPANY, INC., a New Jersey corporation, THE PILLSBURY COMPANY, a Delaware corporation.) THE PROCTOR & GAMBLE MANUFACTURING COMPANY, an Ohio corporation, PROGRESS PAINT MANUFACTURING COMPANY, a Kentucky corporation, QUAKER WINDOW PRODUCTS COMPANY, a Missouri corporation, RALSTON PURINA COMPANY, a Kentucky) corporation, ROCKFORD COATINGS CORPORATION, an Illinois corporation, R. R. DONNELLEY & SONS COMPANY, a Delaware corporation, SCHULTE PAINT & LACQUER MANUFACTURING COM-PANY, a Missouri corporation, CITY OF SHIVELY, a Kentucky municipal corporation, SPENCER KELLOGG, INC., a Delaware corporation, SPORLAN VALVE COMPANY, a Missouri corporation, THE SUMMIT FINISHING COMPANY, INC., a Dela-) ware corporation, SUPERIOR EQUIPMENT COMPANY, INC., a Missouri corporation, TANK TRAILER CLEANING, INC., an Illinois corporation, TANK WASH, INC., an Illinois corporation, TEEPAK, INC., a Delaware corporation, U. S. POSTAL SERVICE, a business entity, and WASTEX RESEARCH. INC., an Illinois corporation.

NOTICE PURSUANT TO SECTION 4(q)
OF THE ENVIRONMENTAL PROTECTION ACT

I. GENERAL

This Notice is issued pursuant to the authority vested in the Illinois Environmental Protection Agency (hereinafter "Agency") by Section 4(q) of the Environmental Protection Act (hereinafter "Act"), Ill. Rev. Stat. 1987, ch. 111 1/2, par. 1004(q).

Allwaste Tank Cleaning Services, Inc., Barry-Wehmiller Company, Belleville Shoe Manufacturing Company, Brown Group, Inc., Bull Moose Tube Company, Cargill, Inc., Channahon Septic Service, Charles Johnson Company, Chemical Waste Management, Inc., Chemsico, Inc., Chrysler Corporation, Coaliquid, Inc., Colgate-Palmolive Company, Continental Can Company, Inc., DCE, Inc., DeHart Paint & Varnish Company, Dennis Chemical Company, Inc., Don White Oil Service,

Inc., E G Composites, Inc., Enrac Chemical, Environmental International, Ford Motor Company, Fruehauf Corporation, Herr Oil Products, Inc., Husky Corporation, Hussmann Refrigeration, Inc., Independent Tank Cleaning Services. Inc., Indiana Department of Highways, Inmont Corporation, Jefferson City Tool Company, Jones Chemicals, Inc., Kentucky Correctional Industries, Kister Lumber Company, Leggett & Platt, Inc., Louisville Golf Club Company, The Marley Cooling Tower Company, McGrew Color Graphic, McKnight Chemical Company, Metal Decorating Company, Mid South Painting, Midland Color Company, Missouri Department of Corrections, Missouri Highway Department, Mobil Oil Corporation. Mueck Auto Body Company, Multi-Metals Company, National Envelope Corporation -Midwest. The Orchard Corporation of America, Pan American Industries, Inc., Paper Art Company, Inc., The Pillsbury Company, The Proctor & Gamble Manufacturing Company, Progress Paint Manufacturing Company, Quaker Window Products Company, Ralston Purina Company, Rockford Coatings Corporation, R. R. Donnelley & Sons Company, Schulte Paint and Lacquer Manufacturing Company, City of Shively, Spencer Kellogg, Inc., Sporlan Valve Company, The Summit Finishing Company, Inc., Superior Equipment Company, Inc., Tank Trailer Cleaning, Inc., Tank Wash, Inc., Teepak, Inc., U. S. Postal Service, and Wastex Research, Inc. (hereinafter "Parties") shall undertake all actions required by terms and conditions of this Notice. Failure by the Parties to undertake such actions may result in sanctions against them, including but not limited to the sanctions described below in Section XVII.

II. STATEMENT OF PURPOSE

The objectives of the Agency are: (1) to determine fully the nature and extent of the threat to the public health or welfare or the environment caused by the release or threatened release of hazardous substances, pollutants, or contaminants from the Site (the term "Site" is defined for purposes of this Notice as the facility described in Section III), and (2) to evaluate and under-take appropriate response action to prevent or mitigate the migration or release or threatened release of hazardous substances, pollutants, or contaminants from the Site. The activities conducted pursuant to this Notice are subject to approval by the Agency and shall be consistent with the Illinois Hazardous Substances Pollution Contingency Plan, 35 Ill. Adm. Code, Part 750, as amended.

III. FINDINGS OF FACT

The following constitutes an outline of the facts upon which this Notice is based.

- A. Allwaste Tank Cleaning Services, Inc. is a Georgia corporation qualified to do business in Illinois.
- B. Barry-Wehmiller Company is a Missouri corporation and is not qualified to do business in Illinois.
- C. Belleville Shoe Manufacturing Company is a Delaware corporation qualified to do business in Illinois.
- D. Brown Group, Inc. is a New York corporation qualified to do business in Illinois.

- E. Bull Moose Tube Company is a Missouri corporation qualified to do business in Illinois.
- F. Cargill, Inc. is a Delaware corporation qualified to do business in Illinois.
 - G. Channahon Septic Service is a business entity.
 - H. Charles Johnson Company is a business entity.
- I. Chemical Waste Management, Inc. is a Delaware corporation qualified to do business in Illinois.
- J. Chemsico, Inc. is a Delaware corporation and is not qualified to do business in Illinois.
- K. Chrylser Corporation is a Delaware corporation qualified to do business in Illinois.
- L. Coaliquid, Inc. is a Kentucky corporation and is not qualified to do business in Illinois.
- M. Colgate-Palmolive Company is an Indiana corporation qualified to do business in Illinois.
- N. Continental Can Company, Inc. is a Delaware corporation qualified to do business in Illinois.
- O. DCE, Inc. is a Kentucky corporation and is not qualified to do business in Illinois.
- P. DeHart Paint & Varnish Company is a Kentucky corporation and is not qualified to do business in Illinois.
- Q. Dennis Chemical Company, Inc. is a Missouri corporation and is not qualified to do business in Illinois.
- R. Don White Oil Service, Inc. is an Iowa corporation qualified to do business in Illinois.

- S. E G Composites, Inc. is an Indiana corporation and is not qualified to do business in Illinois.
 - T. Enrac Chemical is a business entity.
- U. Environmental International is a Kansas corporation and is not qualified to do business in Illinois.
- V. Ford Motor Company is a Delaware corporation qualified to do business in Illinois.
- W. Fruehauf Corporation is a Michigan corporation qualified to do business in Illinois.
- X. Herr Oil Products, Inc. is an Iowa corporation qualified to do business in Illinois.
- Y. Husky Corporation is a Missouri corporation and is not qualified to do business in Illinois.
- Z. Hussmann Refrigeration, Inc. is a Missouri corporation and is not qualified to do business in Illinois.
- AA. Independent Tank Cleaning Services, Inc. is a Georgia corporation qualified to do business in Illinois.
 - BB. Indiana Department of Highways is an agency of the State of Indiana.
- CC. Inmont Corporation is an Ohio corporation qualified to do business in Illinois.
- DD. Jefferson City Tool Company is an Ohio corporation and is not qualified to do business in Illinois.
- EE. Jones Chemicals, Inc. is an Indiana corporation qualified to do business in Illinois.
- FF. Kentucky Correctional Industries is an agency of the State of Kentucky.

- GG. Kister Lumber Company is a business entity.
- HH. Leggett & Platt, Inc. is a Kentucky corporation and is not qualified to do business in Illinois.
- II. Louisville Golf Club Company is a Kentucky corporation and is not qualified to do business in Illinois.
- JJ. The Marley Cooling Tower Company is a Kentucky corporation qualified to do business in Illinois.
 - KK. McGrew Color Graphic is a business entity.
- LL. McKnight Chemical Company is a Missouri corporation and is not qualified to do business in Illinois.
 - MM. Metal Decorating Company is a business entity.
 - NN. Mid South Painting is a business entity.
- OO. Midland Color Company is a Delaware corporation qualified to do business in Illinois.
- PP. Missouri Department of Corrections is an agency of the State of Missouri.
 - QQ. Missouri Highway Department is and agency of the State of Missouri.
- RR. Mobil Oil Corporation is a New York corporation qualified to do business in Illinois.
- SS. Mueck Auto Body Company is a Missouri corporation and is not qualified to do business in Illinois.
 - TT. Multi-Metals Company is a business entity.
- UU. National Envelope Corporation Midwest is a Kansas corporation qualified to do business in Illinois.
- VV. The Orchard Corporation of America is a Missouri corporation and is not qualified to do business in Illinois.

- WW. Pan American Industries, Inc. is a Missouri corporation and is not qualified to do business in Illinois.
- XX. Paper Art Company, Inc. is a New Jersey corporation and is not qualified to do business in Illinois.
- YY. The Pillsbury Company is a Delaware corporation qualified to do business in Illinois.
- ZZ. The Proctor & Gamble Manufacturing Company is an Ohio corporation qualified to do business in Illinois.
- AAA. Progress Paint Manufacturing Company is a Kentucky corporation and is not qualified to do business in Illinois.
- BBB. Quaker Window Products Company is a Missouri corporation and is not qualified to do business in Illinois.
- CCC. Ralston Purina Company is a Kentucky corporation qualified to do business in Illinois.
 - DDD. Rockford Coatings Corporation is an Illinois corporation.
- EEE. R. R. Donnelley & Sons Company is a Delaware corporation qualified to do business in Illinois.
- FFF. Schulte Paint and Lacquer Manufacturing Company is a Missouri corporation and is not qualified to do business in Illinois.
 - GGG. The City of Shively is a Kentucky municipal corporation.
- HHH. Spencer Kellogg, Inc. is a Delaware corporation and is not qualified to do business in Illinois.
- III. Sporlan Valve Company is a Missouri corporation qualified to do business in Illinois.
- JJJ. The Summit Finishing Company, Inc. is a Delaware corporation and is not qualified to do business in Illinois.

- KKK. Superior Equipment Company, Inc. is a Missouri corporation and is not qualified to do business in Illinois.
 - LLL. Tank Trailer Cleaning, Inc. is an Illinois corporation.
 - MMM. Tank Wash, Inc. is an Illinois corporation.
- NNN. Teepak, Inc. is a Delaware corporation qualified to do business in Illinois.
 - 000. U. S. Postal Service is a business entity.
- PPP. Wastex Research, Inc. is an Illinois corporation. Its principal place of business is at 2000 Broadway, East St. Louis, Illinois. Mr. James Markle is president of Wastex Research, Inc.
- QQQ. Wastex Research, Inc. has operated since 1979 and has been in the business of reusing, inter alia, spent solvents which can be blended and burned as a supplemental fuel in industrial boilers and asphalt plants. The company primarily handled waste paint solvents, but also handled waste printing inks, waste oils, and other hazardous wastes and special wastes as those terms are defined in Sections 3.15 and 3.45 of the Act (III. Rev. Stat. 1987, ch. 111 1/2, pars. 1003.15 and 1003.45). Such activity took place at the above mentioned 2000 Broadway location on property encompassing approximately 13.8 acres and situated approximately 1500 feet from a residential area.
- RRR. The "Site" which is the subject of this Notice encompasses the property located at 2000 Broadway in East St. Louis, St. Clair County, Illinois (see the shaded portion of the diagram included in this Notice as Attachment 1) and any contiguous areas of contamination described in this Notice or discovered as a result of the Identified Response Action described in Section VI. The Site includes Tax Parcel No. 02-19-0-300-008 consisting of

approximately 9.74 acres which is owned by the County of St. Clair, Trustee, pursuant to a Tax Deed recorded in St. Clair County on January 14, 1987 in book no. 2661, page 2384.

- SSS. The materials described above in Section III(QQQ) of this Notice have been placed in various tanks and containers remaining at the Site. Certain buildings and features located on part of the Site are shown on the diagram included in this Notice as Attachment 2. Based upon recent information obtained by the Agency, such materials include the following wastes or contaminants:
 - 1. Approximately 3,500 drums, containing mostly hazardous waste, are stored in buildings 3, 16, 22, 31 and 35. Such drums have been commonly referred to as the "Chase Inventory" and were on-site prior to when James Markle acquired Wastex Research, Inc. Jack Chase was the previous owner/operator of Wastex Research, Inc.
 - 2. An additional group of approximately 3,500 drums, containing mostly hazardous waste, are stored in buildings 1, 3, 22 and 38.
 Such drums have been commonly referred to as the "Wastex Inventory".
 - 3. Bulk tanks present at the Site contain a variety of blended and unblended liquids and semi-solids, most of which are from hazardous wastes shipped to Wastex Research, Inc. Based upon recent information obtained by the Agency from reports and records of Wastex Research, Inc., the contents and approximate volumes in such bulk tanks were as follows:

<u>Tank Contents</u>	Approximate Volume (Gallons)
Unblended Waste	50,000
Waste Oil Containing Polychlorinated Biphenyls	13,000

Tank Contents

Approximate Volume (Gallons)

Waste Reportedly Blended for Asphalt Plant Fuel

70,000

Waste Reportedly Blended for Cement Kiln Fuel

225,000

TTT. During an Agency inspection of hazardous waste storage conducted on February 17, 1989, there were thirty-four drums observed to be leaking or to have leaked and six drums were observed being stored open in buildings 1 and 38. Numerous similar problems with drum storage were noted in other buildings at the Site.

UUU. During an Agency inspection of hazardous waste storage conducted on September 14, 1988, twenty-nine drums were found which did not have lids or had unsecured lids, thirteen drums were observed to be leaking or to have leaked, five drums did not have bungs in place, and four drums had only plastic on top for cover. Those drums were in buildings 1, 3, 16, 22, 31 and 38. Numerous similar problems with drum storage have been noted in prior Agency inspections of hazardous waste storage at the Site, including inspections conducted on July 28, 1986, September 24, 1987, 3 1988 and April 7, 1988.

VVV. Waste was observed leaking onto the group' during Agency inspections of September 14, 1989 tank had been used to store bulk hazardour

WWW. On November 12, 1986, samp1

Envirodyne Engineers, Inc. Samp'

stored at the Site. Analys'

following levels of co

Sample	Bldg.	Contaminant Milligra	Concentration
No.	No.		ms/Liter (Parts Per Million)
X201	38	toluene	44,798
X202	38	ethylbenzene	67,013
X202	38	toluene	10,974
X202	38	xylenes (total)	26,076
X203	38	ethylbenzene	17,127
X203	38	toluene	196,148
X203	38	xylenes (total)	64,120
X204	38	tetrachloroethylene	21,613
X205	38	ethylbenzene	8,892
X205	38	xylenes (total)	4,258
X206	38	toluene	224,877
X207	38	toluene	169,866
X208	38	ethylene	102,328
X208	38	xylenes (total)	354,896
X209	38	tetrachloroethylene	34,110
X210	38	toluene	13,426
X210	38	xylenes (total)	4,534
X211	3	ethylbenzene	18,085
X211	3	xylenes (total)	81,809
X212	3	xylenes (total)	890
X213 X213 X213 X213 X213 X213 X213	3 3 3 3 3 3	barium (EP toxicity) cadmium (EP toxicity) chromium (EP toxicity) ethylbenzene lead (EP toxicity) toluene xylenes (total)	10.200 0.023 0.311 1,048 12.400 563 5,145
X215	3	toluene	9,578
X216	3	ethylbenzene	22,170
X216	3	toluene	12,840
X219A	3	ethylbenzene	42,829
X219A	3	toluene	61,337
X219B	3	ethylbenzene	59,610
X219B	3	toluene	76,652

Sample No.	Bldg. No.	Contaminant Millic	Concentration grams/Liter (Parts Per Million)	
X220 X220	3	ethylbenzene toluene	3,702 71,079	
X221	35	ethylbenzene	3,322	
X221	35	lead (EP toxicity)	6.940	
X221	35	toluene	1,818	
X221	35	xylenes (total)	19,448	
X222	3	ethylbenzene	46,108	
X222	3	toluene	22,117	
X222	3	xylenes (total)	131,899	
X223	35	ethylbenzene	3,689	
X223	35	xylenes (total)	13,629	
X224 X224 X224 X224 X224	35	cadmium (EP toxicity) chromium (EP toxicity) lead (EP toxicity) toluene xylenes (total)	9.700 1.200 0.475 1,071 1,163	
X230	35	ethylbenzene	4,232	
X230	35	xylenes (total)	13,135	
X231	38	ethylbenzene	8,248	
X231	38	xylenes (total)	60,023	
X232	38	ethylbenzene	15,808	
X232	38	toluene	46,881	
X232	38	xylenes (total)	7,539	

XXX. On December 9, 1986, the Agency collected samples of waste oil found to contain polychlorinated biphenyls (PCBs). The samples were taken from the agitator tank in building 38 and from a truck tank which returned a load of waste rejected by a cement kiln facility to Wastex Research, Inc. Analysis results for those two samples, respectively, were 8,100 micrograms/gram (parts per million) and 150 micrograms/gram of PCBs.

YYY. A drum of waste being stored open on a building loading dock at the Site was sampled by the Agency on October 12, 1983. Analysis results for that sample indicated the following levels of contaminants were present.

Contaminant	Concentration Micrograms/Gram (Parts Per Million)
Containmant	THE TOUT AMOUNT OF AMOUNT OF THE THE TOUT
C3 - substituted benzenes	210
C4 - substituted benzenes	2,800
C5 - substituted benzenes	310
cyclohexane	1,000
methylnapthalene	100
napthalene	700
toluene	3,300
xylenes	14,000

ZZZ. Leakage remaining on top of an unmarked drum in building 1 was sampled by the Agency on July 28, 1986. Analysis results for that sample indicated the following levels of contaminants were present.

	Concentration		
Contaminant	Micrograms/Gram (Parts Per Million)		
ethylbenzene	60		
toluene	25		
x y 1 e'n e s	230		

AAAA. During an Agency inspection conducted on December 21, 1987, there were twenty-one drums of kerosene being stored in the building 3 and 22 area, along with a reported 1591 drums of the Chase Inventory. In buildings 16 and 31, where 1650 drums of the Chase Inventory were reported stored, there were a number of drums observed sitting in a pool of frozen rainwater. The remaining Chase Inventory, consisting of a reported 546 drums, was being stored in building 35.

BBBB. Wastex Research, Inc. provided what was described as a complete inventory of its tanks and drums to the Agency on December 11, 1987. A copy of said inventory is included in this Notice as Attachment 3.

CCCC. Many of the drums included in the Chase Inventory are corroded or in poor condition. Also included are numerous drums without lids which are stacked on top of one another with plywood and plastic between the drum layers. Almost all of the Chase Inventory drums lack markings to indicate their contents. In building 16 where part of the Chase Inventory is stored there are a number of holes in the floor leading to a basement area.

DDDD. On or about September 23, 1981, an explosion and fire occurred at a bulk storage tank, which had a capacity of approximately 500,000 gallons, located on the portion of the Site known as Tax Parcel No. 02-19-127-001. The incident took place when welding was being done on tank equipment. The top of the tank blew off and a fire resulted. The tank reportedly contained about 3,500 gallons of paint sludges and fuel oil on top of a heavy oil sludge.

EEEE. Based upon State records and investigations, the Agency has reason to believe the Parties, listed as follows, did, by contract, agreement, or otherwise, arrange for the transport, storage, disposal or treatment of hazardous substances owned, controlled or possessed by them and that such hazardous substances came to be located at the Site:

Allwaste Tank Cleaning Services, Inc.
Barry-Wehmiller Company
Belleville Shoe Manufacturing Company
Brown Group, Inc.
Bull Moose Tube Company
Cargill, Inc.
Channahon Septic Service
Charles Johnson Company
Chemical Waste Management, Inc.
Chemsico, Inc.
Chrysler Corporation
Coaliquid, Inc.

Colgate-Palmolive Company Continental Can Company, Inc. DCE, Inc. DeHart Paint & Varnish Company Dennis Chemical Company, Inc. Don White Oil Service, Inc. E G Composites, Inc. Enrac Chemical Environmental International Ford Motor Company Fruehauf Corporation Herr Oil Products, Inc. Husky Corporation Hussmann Refrigeration, Inc. Independent Tank Cleaning Services, Inc. Indiana Department of Highways Inmont Corporation Jefferson City Tool Company Jones Chemicals, Inc. Kentucky Correctional Industries Kister Lumber Company Leggett & Platt, Inc. Louisville Golf Club Company The Marley Cooling Tower Company McGrew Color Graphic McKnight Chemical Company Metal Decorating Company Mid South Painting Midland Color Company Missouri Department of Correcti Missouri Highway Department Mobil Oil Corporation Mueck Auto Body Company Multi-Metals Company National Envelope Corporation The Orchard Corporation of Pan American Industries, I' Paper Art Company, Inc. The Pillsbury Company The Proctor & Gamble Man Progress Paint Manufacti Ouaker Window Products Ralston Purina Company Rockford Coatings Corr R. R. Donnelley & Son Schulte Paint and La City of Shively Spencer Kellogg, In Sporlan Valve Comp. The Summit Finish? Superior Equipmen Tank Trailer Cle Tank Wash, Inc. Teepak, Inc.

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.m to human life and health and

U. S. Postal '

IV. CONCLUSIONS OF LAW

- A. The Site described in Section III is a "facility" as defined in Section 22.2(h)(1) of the Act, Ill. Rev. Stat. 1987, ch. 111 1/2, par. 1022.2(h)(1).
- B. Each of the Parties is a "person" as defined in Section 3.26 of the Act, Ill. Rev. Stat. 1987, ch. 111 1/2, par. 1003.26.
- C. Wastes and constituents thereof and contaminants found at the Site are "hazardous substances" as defined in Section 3.14 of the Act, Ill. Rev. Stat. 1987, ch. 111 1/2, par. 1003.14.
- D. The past, present and/or potential migration of hazardous substances from the Site constitutes an actual and/or threatened "release" as defined in Section 3.33 of the Act, Ill. Rev. Stat. 1987, ch. 111 1/2, par. 1003.33.
- E. The Parties are persons who may be liable pursuant to Section 22.2(f) of the Act, Ill. Rev. Stat. 1987, ch. 111 1/2, par. 1022.2(f), for a release or threat of release of a hazardous substance.

V. DETERMINATIONS

Based on the Findings of Fact and Conclusions of Law set out above, the Agency has determined that:

- A. The release of hazardous substances from the Site which is described in Section III presents an immediate and significant risk of harm to human life and health and the environment.
- B. The actions required by this Notice are necessary to prevent or mitigate immediate and significant risk of harm to human life and health and the environment.

VI. IDENTIFIED RESPONSE ACTION

- A. The Parties shall furnish the necessary personnel, materials, services, facilities, and otherwise do all things necessary for or incident to the performance of the work items set forth below.
- B. Each Party shall notify the Agency in writing within thirty (30) days of the effective date of this Notice, of the nature and extent of the corrective measures that such Party is willing to undertake to clean up the Site and a schedule for such action. If the Party fails to notify the Agency within thirty (30) days of the effective date of this Notice, the Agency will assume that such Party refuses to undertake a voluntary clean up of the Site, and the Agency will proceed accordingly.

The notification shall indicate the appropriate name, address, and telephone number for further contact with the Party, and shall include a statement of the type and extent of the activity which such Party is willing to undertake and a schedule for such action.

Where the Party is already involved in discussions with federal, state, or local authorities, engaged in a voluntary action or involved in a lawsuit regarding the Site, the notification shall contain a report of the status of those discussions or that action or lawsuit. A copy of the notification shall be provided to any other party involved in those discussions.

The notification shall be sent to:

Bruce L. Carlson, Attorney Enforcement Programs Illinois Environmental Protection Agency 2200 Churchill Road Post Office Box 19276 Springfield, Illinois 62794-9276

- C. All work performed pursuant to this Notice shall be under the supervision of a qualified professional engineer or response cleanup contractor approved by the Agency. The professional engineer or contractor shall have expertise in the cleanup of hazardous substances.
- D. The Parties shall obtain prior Agency approval of all contractors, subcontractors, consultants, and laboratories used to perform the Identified Response Action. In addition, the Agency shall be consulted routinely throughout the project to provide continued review and comments.
- E. The Parties shall provide five (5) copies to the Agency of all reports or other documents which must be submitted to the Agency under this Notice.
- F. The Parties shall perform the following work at the Site commencing immediately upon Agency approval of the work plan described in Section VI(G) and concluding no later than October 31, 1989:
 - 1. Develop a complete inventory and log of all drums, bulk tanks, and other waste containers at the Site. This log is to include at a minimum:
 - Container number;
 - Description of container;
 - Condition of container;
 - Physical description of waste within container (pumpable or non-pumpable);
 - Estimated volume of waste within container;
 - Those containers requiring overpacking;
 - Any and all markings, lables, etc. on each drum; and
 - All information specified.
 - 2. Personnel sampling the containers must be equipped with Level C personal protective gear unless site conditions during sampling require a more protective level. Level C protection shall consist of, at a minimum,

saranex suit, full-face respirator, disposable boots and gloves. All containers shall be sampled and compatibility testing shall be performed on each container and shall include at a minimum:

- Ignitability (flashpoint);
- Determination of oxidizing of reducing agent;
- Reactivity;
- Density;
- Concentration of organic halides;
- Ha
- Cyanides (reported on a positive/negative basis);
- Sulfides (reported on a positive/negative basis):
- PCBs (reported on a positive/negative basis); and
- Dioxins (to be determined on PCB-positive waste).

Compatibility testing shall be conducted at the Site. Based upon the compatiblity testing, two composite samples shall be collected from each compatible group. A log shall be maintained that indicates which containers are represented in each pair of composite samples.

- 3. Any container which is damaged during sampling or any drum which is not DOT transportable shall be overpacked.
- 4. All containers shall be staged in an area designated by the Agency's On-Scene Coordinator. The staging will be done on an impermeable liner (visqueen or similar material) such that spillage will not infiltrate and contaminate the floor beneath the liner. The containers are to be segregated according to the compatibility groupings.
- 5. Any leaking bulk tanks shall be emptied into secure containers until disposal of the contents can be arranged. All containers used to contain waste from leaking bulk tanks shall be clearly labeled as to contents and the tank from which the waste came. These containers shall be staged with the other containers on the Site in compatible groups.

- 6. Twenty-five (25) soil samples shall be collected at a miminum depth of six inches. The sample locations will be at the direction of the Agency's On-Scene Coordinator. The areas that are to be sampled are generally those which are presently or were formerly used to store wastes.
- 7. Up to three samples from the basement of each building used to store wastes shall be collected at the direction of the Agency's On-Scene Coordinator. Depending upon the specific condition of each basement, waste, wipe and/or water samples will be collected.
- 8. Up to three wipe samples from the paved area outside building 35, known as the "fixation" area, shall be collected at the direction of the Agency's On-Scene Coordinator.
- 9. Up to three soil samples from the area where the tank explosion and fire described above in Section III(DDDD) occurred, shall be collected at the direction of the Agency's On-Scene Coordinator.
- 10. All disposal protective gear used by personnel at the Site shall be contained in drums. These drums shall be appropriately labeled and staged with other containers upon completion of this phase.
- 11. Decontamination facilities shall be provided for all personnel at the Site.
- 12. All decontamination liquids used for this phase shall be drummed.

 These drums shall be appropriately labeled and staged with other

 containers upon completion of this phase.
- 13. At the end of this phase of work, a representative sample shall be collected from the drums described in the above paragraph 12.
- 14. A telephone shall be provided at the Site. The telephone shall be accessible to the Agency's On-Scene Coordinator.

- 15. Immediate access to Level B equipment shall be available at the Site at all times. Level B protection shall consist of the same equipment as Level C, except an airline supplied air breathing apparatus shall be substituted for the full face respirator.
- 16. A final sampling report shall be prepared, including a description of sampling and decontamination methods, the container/bulk tank inventory as specified in paragraphs 1 and 2 above, all analytical data, and a cleanup plan. The cleanup plan shall include: a detailed proposal for disposal of all containers, container contents, bulk tank contents, and contaminated material (soil, etc.); a detailed proposal to decontaminate any waste storage pads and waste containing structures that will not be removed from the Site during the cleanup; and, an evaluation based upon the sampling results obtained of whether groundwater monitoring is needed at the Site. If the report indicates that groundwater monitoring is needed, a proposal for a program to conduct such monitoring shall be included in the cleanup plan. If the report indicates that groundwater monitoring is not needed, the detailed basis for such conclusion shall be set forth therein.
- 17. Upon submission of the final sampling report, the Agency will establish cleanup objectives for soils, storage pad and building surfaces, and, if necessary, for groundwater. Cleanup objectives are the maximum concentrations of specific contaminants allowable to remain after response action takes place in order to satisfy this Notice.
- 18. Upon Agency approval of the cleanup plan included in the final sampling report, the Parties shall perform the work specified in the cleanup plan.

- G. Within sixty (60) days of the effective date of this Notice, the Parties shall submit a detailed work plan which sets forth the manner in which the Parties will perform the work set forth in Section VI(F). The work plan shall include, among other matters, (a) a site specific Health and Safety Plan in accordance with "Department of Labor, Occupational Safety and Health Administration—Hazardous Waste Operations and Emergency Response" as outlined in 29 CFR Part 1910, Vol. 51, No. 244, December 19, 1986, p. 45654, and (b) a Quality Assurance Project Plan (QAPP) in accordance with the requirements of the U.S. EPA's Contract Laboratory Program. These two items shall be included as addenda to the work plan. Provisions for collecting and analyzing post—removal samples must be included in order to insure that all cleanup objectives are met. Unless written approval is given by the Agency, the post—removal sampling shall be under the direction of the Agency's On—Scene Coordinator.
- H. At the conclusion of the above Identified Response Action, the Parties shall submit a summary report of the work completed. The report shall include the volumes and disposition of all wastes removed from the Site. The report shall also include the results of the post-removal sampling. These results will be used to verify whether the Agency's cleanup objectives have been met.
- I. The Agency will conduct a meeting of all potentially responsible parties at 10:00 a.m. on June 20, 1989, at headquarters office located at 2200 Churchill Road, Springfield, Illinois. The purpose of this meeting will be to discuss the issues addressed in this Notice. Please contact Bruce Carlson of the Agency's legal staff at 2200 Churchill Road, Post Office Box 19276, Springfield, Illinois, 62794-9276 or at telephone number 217/782-5544 if you have any questions.

VII. DESIGNATED PROJECT COORDINATORS

The Agency and the Parties shall each designate a Project Coordinator.

Each Project Coordinator shall be responsible for overseeing implementation of this Notice. The Agency Project Coordinator will be the Agency's designated representative. The Parties shall each designate such Coordinator and inform the Agency in writing of their Coordinator's identity, address and telephone number within fourteen (14) days of the effective date of this Notice. The Agency's Project Coordinator is hereby designated as:

Brian Martin
Remedial Project Management Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276
Telephone Number: 217/782-6760

To the maximum extent possible, communications between the Parties and the Agency and all documents, including reports, approvals and other correspondence concerning the activities performed pursuant to the terms and conditions of this Notice, shall be directed through the Project Coordinators.

The Agency designated "On-Scene Coordinator", who may also be the Agency's Project Coordinator, shall have the authority to halt, conduct, or direct any tasks required by this Notice and/or any response actions or portions thereof when conditions present an immediate risk to public health or welfare or the environment. In the even that the Agency On-Scene Coordinator halts such tasks for a specified period of time, the Parties shall be given an additional amount of time equal to the period of delay in order to complete subsequent tasks. The Agency's On-Scene Coordinator is hereby designated as:

Thomas Miller
Field Operations Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
2009 Mall Street
Collinsville, Illinois 62234
Telephone Number: 618/346-5120

The absence of the Agency Project Coordinator or On-Scene Coordinator from the Site shall not be cause for the stoppage of work.

The Agency and the Parties each have the right to change their respective Project Coordinators. The Agency also has the right to change its On-Scene Coordinator. Any such change shall be accomplished by notifying the other party in writing at least five (5) calendar days prior to the change.

VIII. SAMPLING, ACCESS AND DATA/DOCUMENT AVAILABILITY

The Parties shall make the results of all sampling and/or tests or other data generated by the Parties, or on the Parties' behalf, with respect to the implementation of this Notice, available to the Agency and shall submit these results upon request by the Agency. The Agency will make available to the Parties the results of sampling and tests or other data similarly generated by the Agency.

At the request of the Agency, the Parties shall allow split or duplicate samples to be taken by the Agency and its authorized representatives, of any samples collected by the Parties pursuant to the implementation of this Notice. The Parties shall notify the Agency not less than forty-eight (48) hours in advance of any sample collection activity.

The Agency and any Agency authorized representative shall have the authority to enter and freely move about all property at the Site at all reasonable times for the purposes of, inter alia: inspecting records,' operating logs and contracts related to the Site; reviewing the progress of

the Parties in carrying out the terms of this Notice; conducting such tests as the Agency or the Project Coordinator deem necessary; using a camera, sound recording or other documentary type equipment; and verifying the data submitted to the Agency by the Parties. The Parties shall permit such persons to inspect and copy all records, files, photographs, documents and other writings, including all sampling and monitoring data, in any way pertaining to work undertaken pursuant to this Notice. All parties with access to the Site pursuant to this paragraph shall comply with all approved health and safety plans.

IX. RECORD PRESERVATION

The Parties shall preserve, during the pendency of this Notice and for a minimum of six (6) years after its termination, all records and documents in their possession or in the possession of their divisions, employees, agents, accountants, contractors or attorneys which relate in any way to the Site, despite any document retention policy to the contrary. The Parties may fulfill this obligation by retention on microfilm or other comparable record keeping. After this six year period, the Parties shall notify the Agency thirty (30) calendar days prior to the destruction of any such documents. Upon request by the Agency, the Parties shall make available to the Agency such records or copies of any such records. Additionally, if the Agency requests that some or all documents be preserved for a longer period of time, the Parties shall comply with that request. Compliance with this Paragraph shall not be construed to indicate a waiver of any applicable right of privilege.

X. RESERVATION OF RIGHTS

Notwithstanding compliance with the terms of this Notice, including the completion of the work set forth in Section VI, the Parties are not released from liability, if any, for any actions beyond the terms of this Notice taken by the Agency respecting the Site. The Agency reserves the right to take any enforcement action pursuant to the Act or any available legal authority, including the right to seek injunctive relief, monetary penalties and punitive damages for any violation of law or this Notice.

The Agency expressly reserves all rights that it may have, including the Agency's right both to disapprove of work performed by the Parties and to request that the Parties perform tasks in addition to those provided for by this Notice. In the event the Parties decline to perform any additional or modified tasks, the Agency will have the right to undertake any such work.

In addition, the Agency reserves the right to undertake removal actions or remedial actions at any time. The Agency reserves the right to seek reimbursement from the Parties thereafter for any and all such costs incurred by the State of Illinois related to the release or threat of release of hazardous substances at the Site.

XI. ABATEMENT OF ENDANGERMENT

In the event that the Director of the Agency determines that any activities implementing the Identified Response Action or in non-compliance therewith, or any other circumstances or activities are creating an imminent or substantial endangerment to the health and welfare of the people on the Site or in the surrounding area or to the environment, the Director may issue

a notice to cease further implementation of the Identified Response Action for such period of time as needed to abate the endangerment.

XII. REIMBURSEMENT OF COSTS

The Agency shall submit to the Parties an accounting of all response and oversight costs incurred by the State of Illinois with respect to this Notice and with respect to this Site. The response and oversight costs included in the accounting submitted by the Agency to the Parties shall include such costs incurred by the Agency during current and prior State fiscal years, including but not limited to all such costs incurred by the Agency prior to the effective date of this Notice. (Note: Response and oversight costs incurred for this Site amount to \$33,811.00 for personal services through November 30. 1988 and for all other such costs through December 31, 1988.) The Parties shall, within thirty (30) calendar days of receipt of that accounting, remit a check for the amount of those costs made payable to the Treasurer-State of Illinois and designated for deposit into the Hazardous Waste Fund. Checks are to specifically identify the Site and be addressed to:

Illinois Environmental Protection Agency Fiscal Services 2200 Churchill Road Post Office Box 19276 Springfield, Illinois 62794-9276

A copy of the transmittal letter shall be sent to the Agency's Project Coordinator.

The Agency reserves the right to bring an action against the Parties pursuant to the Act for recovery of all response and oversight costs incurred by the State of Illinois related to this Notice and not reimbursed by the

schedules and attachments shall be considered a failure to perform the requirements of this Notice.

No informal advice, guidance, suggestions or comments by the Agency regarding reports, plans, specifications, schedules and any other writing submitted by the Parties will be construed as relieving the Parties of their obligation to obtain such formalapproval as may be required by this Notice.

XVI. PARTIES BOUND

This Notice shall apply to and be binding upon the Parties and their agents, successors and assigns and upon all persons, contractors and consultants acting under or for either the Parties or the Agency or both.

No change in ownership or corporate or partnership status relating to the Site will in any way alter the status of the Parties or in any way alter the Parties' responsibility under this Notice. The Parties will be responsible for carrying out all activities required of the Parties under this Notice.

XVII. FAILURE TO COMPLY WITH THIS NOTICE

Pursuant to Section 22.2 of the Act (III. Rev. Stat. 1987, ch. 111 1/2, par. 1022.2), if a party fails without sufficient cause to provide the Identified Response Action as set forth herein upon or in accordance with this Notice and request by the Agency, such failure may subject such party to liability to the State of Illinois for punitive damages in an amount at least equal to, and not more than three times, the amount of any costs incurred by the State as a result of such failure. Such punitive damages shall be in addition to any costs recovered from the liable party pursuant to Section 22.2

of the Act and in addition to any other penalty or relief provided by the Act or any other law.

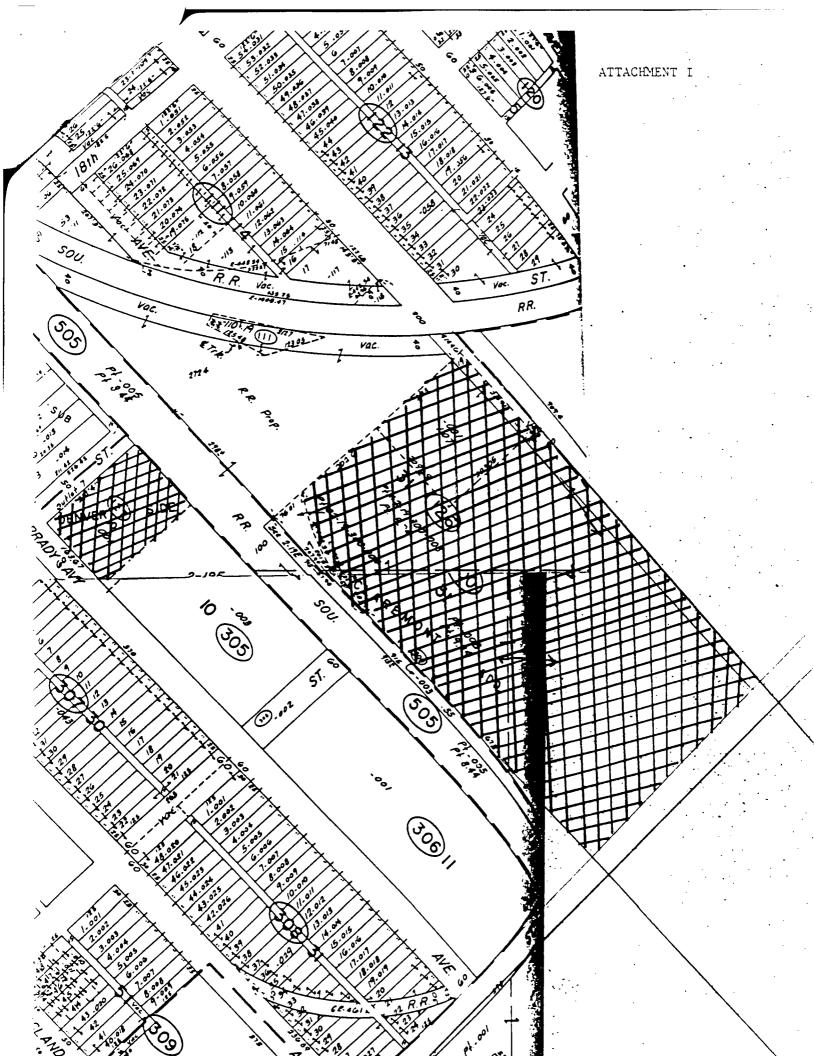
XVIII. TERMINATION AND SATISFACTION

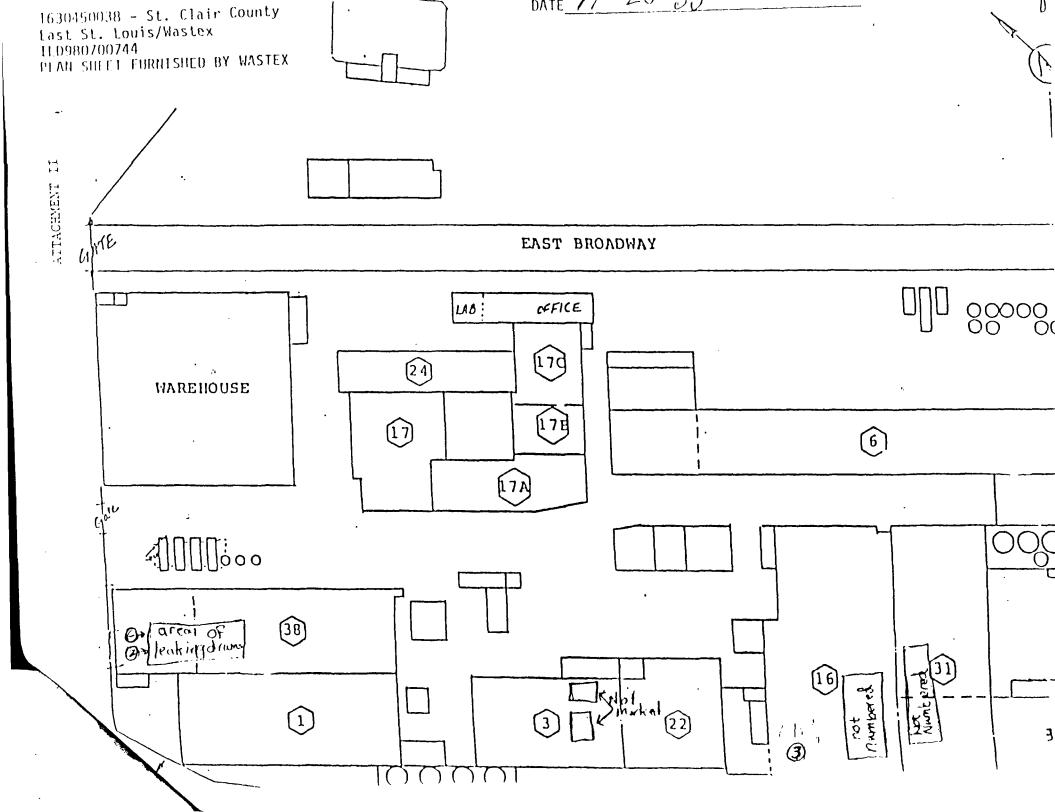
The provisions of this Notice shall be deemed satisfied upon the Parties' receipt of written notice from the Agency that the Parties have demonstrated, to the satisfaction of the Agency, that all of the terms of this Notice, including any additional tasks which the Agency has determined to be necessary, have been completed.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By:	Bernard P. Killian Biractor	DATE:	5/22/85
	Bernard P. Killian Director		

Effective	Date:		
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Eruce Carison

ATTACHMENT III



WASTEX RESEARCH, INC.

December 1, 1987

Illinois Environmental Protection Agency Division of Land Pollution control Compliance Assurance Section 2200 Churchill Road Springfield, Illinois 62706

<u>CERTIFIED MAIL:</u> Return Receipt Requested Receipt Number - P 370 500 639

Rec. Required Inventory as per consent Decree-Wastex Research,

To when may concern

As per the Consent Sie to the Julian of the U.S. District Courses Sie to Description of the U.S. No. 84-3290 the Action courses of the Action of the U.S. Sie to Description of the U.S. S

The main right sub to the main ing, in the complete inventory of the inks

Respectfully submitted.

Wastex Research, Inc.

Terry L. Hein

RECEIVED ENFORCEMENT PROGRAMS

DEC 11 1987

Environmental Protection Agency

RECEIVED

DE0 1 1

IEPA/DIFC

WASTEX RESEARCH, INC.

DRUM INVENTORY

NOVEMBER 1, 1987

For the drum inventory, a seperate inventory will be shown for each building at the facility. The inventory will show the number of drums, location, contents and condition of the container.

The inventory will also reflect the types of materials in each container by the three classifications, hazardous, non-hazardous or special wastes and raw materials.

In cases where more than one numbered building is shown on the plot plan, but those buildings are under a common roof, the buildings will be on one inventory sheet with the exception of buildings 1 and 38. A seperate sheet will be used for each of these buildings.

storage are 1, 38, 3 & 22, The buildings care and go 16 & 31, 35, 17A and 5. A and 5.

The total number of drums in storage at the facility as of this

The total number of druns inventory date is 7,12 to a color 31, 3,787 drums are the Chase inventor of the class in the last a laventory.

The 3,787 drums in the last a laventory.

The 3,787 drums in the last a laventory are stored in three-area of the fact ity is a large to build his 16 & 31 and drums in buildings 16 & 31 and drums in buildings 3 & 22 - Lieu drums in buildings 16 & 31 and 546 drums in buildings

Of the total of 3,344 de in the lastex inventory, 2,512 are classified as hazardous, we are don-hazardous special waste and 57 are raw materials. The drums in the Wastex Enventory are stored as follows; 775 drums of non-hazardous wastes in building 5, 36 drums of raw material in building 17A, 777 drums of hazardous waste in building 38, 300 drums of hazardous waste in building 1, 1,148 drums of hazardous waste and 21 drums of raw material in building 3 & 22 and 287 drums of hazardous waste in building 16 & 31.

The total inventory of drums and their corresponding identification numbers have been entered into the daily operating record of the facility.

RECEIVED

DEG : 1

WASTEX RESEARCH, INC.

DRUM INVENTORY

NOVEMBER 1, 1987

BUILDING 5

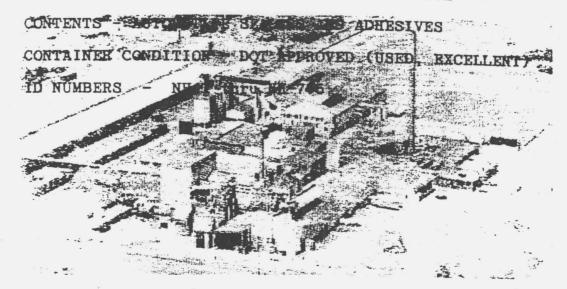
TOTAL NUMBER OF DRUMS IN BUILDING - 775

CHASE INVENTORY - 0

WASTEX INVENTORY - 775

WASTEX INVENTORY:

CLASSIFICATION - NON-HAZARDOUS SPECIAL WASTE



RECEIVED

IEPA/DI EO

ID NUMBERS

= NH-1 thru NH-47 NH-2 = NH-48 thru NH-122

NH-5 = NH-238 thru NH-357NH-6 = NH-358 thru NH-477

NH-S = NH-598 thru NH-717NH-9 = NH-718 thru NH-775

NH-123 thru NH-155

NH-156 thru NH-237

NH-478 thru NH-597

NII-1

NH-3 =

NH-4 =

NH-7 =

RAMP TO LOADING DOCK

NH-1 _47 DRUMS

75 DRUMS NH-2

> NH-3 33 DRUM\$

NH-4 82 DRUMS

NH-5 120 DRUMS

NH-6 120 DRUMS

120 DRUMS NH-7

NH-8 120 DRUMS

NH-9 58 DRUMS

EX

RECEIVED

IEP4/DIFO

EXIT

	11
8	10
DRUMS	DRUMS
WP-22	Mb-30
thru	thru
WP-29	WP-39

18 DRUMS WP-40 thru WP-57

EXIT

EXIT

WASTEX RESEARCH, INC. DRUM INVENTORY NOVEMBER 1, 1987 BUILDING 38

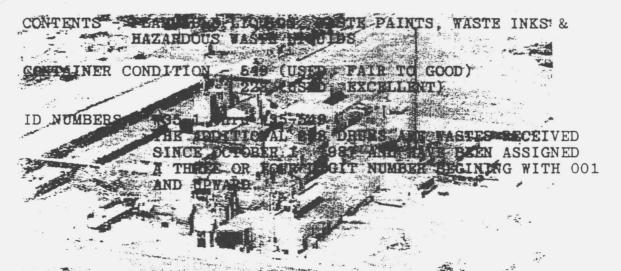
TOTAL NUMBER OF DRUMS IN BUILDING - 777

CHASE INVENTORY - 0

WASTEX INVENTORY - 777

WASTEX INVENTORY:

CLASSIFICATION - HAZARDOUS



XI	Т
RAM	P

RAMP				
W-35-1 thru W35-53	53 DRUMS			
W35-54 thru W35-113	60 DRUMS			
W35-114 thru W35-177	64 DRUMS			
W35-178 thru W35-241	64 DRUMS			
W35-242 thru W35-305	64 DRUMS			
W35-306 thru W35-369	64 DRUMS			
W35-370 thru W35-433	64 DRUMS			
W35-434 thru W35-489] 56 DRUMS			
W35-490 thru W35-549	60 DRUMS			

34 DRUMS CURRENT

44 DRUMS CURRENT

37 DRUMS CURRENT

SO DRUMS CURRENT

15 DRUMS CURRENT

> TS DAUMS CURRENT

> > SECTIVES

EXIT RAMP

TEPA/OFFO

RAMP TO LOADING DC

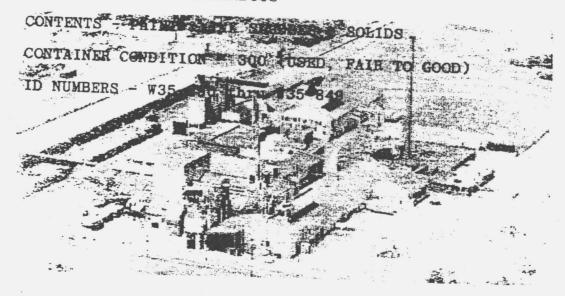
LOADING DOOR

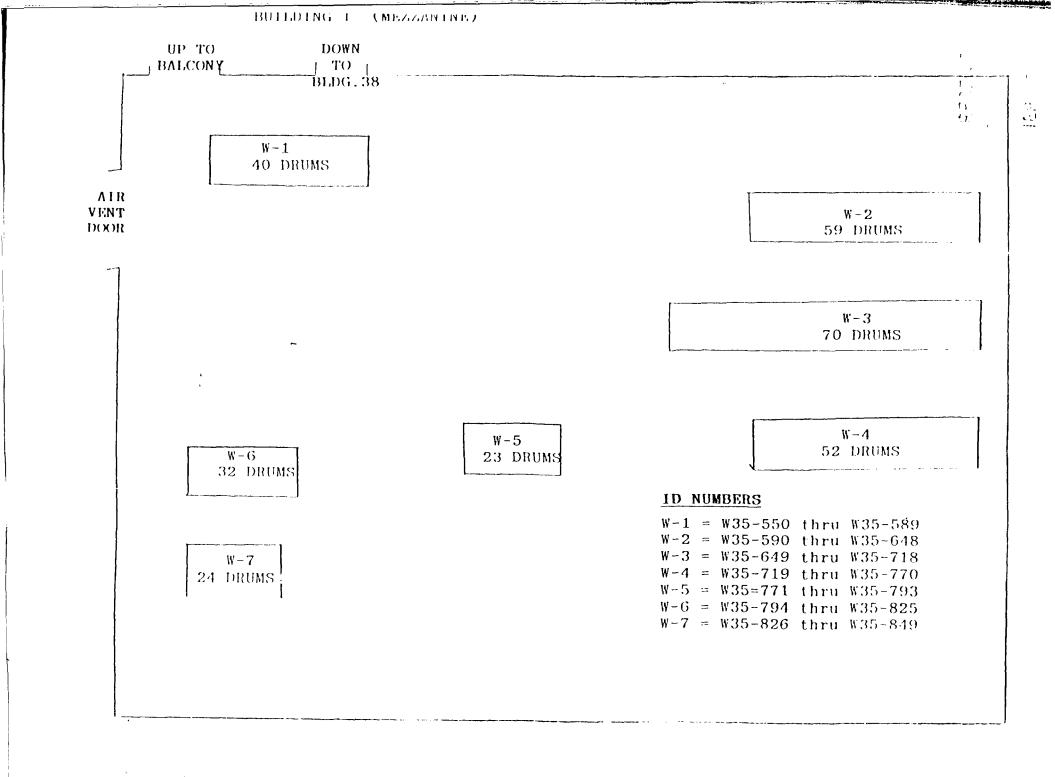
WASTEX RESEARCH, INC. DRUM INVENTORY NOVEMBER 1, 1987 BUILDING 1

TOTAL NUMBER OF DRUMS IN BUILDING - 300 CHASE INVENTORY - 0 WASTEX INVENTORY - 300

WASTEX INVENTORY:

CLASSIFICATION - HAZARDOUS





WASTEX RESEARCH, INC.

DRUM INVENTORY

NOVEMBER 1, 1987

BUILDING 3 & 22

TOTAL NUMBER OF DRUMS IN BUILDINGS - 2,760

CHASE INVENTORY - 1,591

WASTEX INVENTORY - 1,148 - WASTES

21 - PRODUCT/RAW MATERIALS

CHASE INVENTORY:

CLASSIFICATION - HAZARDOUS

CONTENTS F PAINT & THE SOLIDS PAINT RESINS

CONTAINER CONDIT

(SEE LATE TO GOOD)

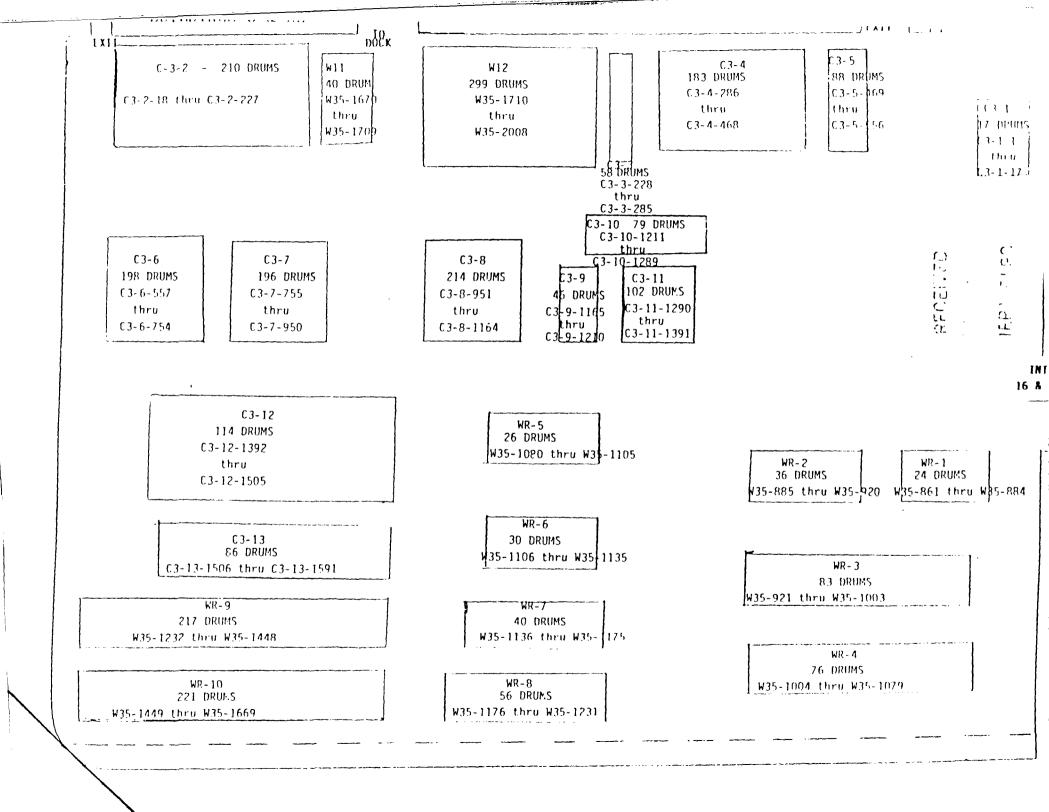
WASTEX LEVENDON

CLASSIPICATION

CONTENTS - PAINT & INK SLUDGES & SOLIDS

CONTAINER CONDITION - 1,148 (USED, FAIR TO GOOD)
21 (RECONDITIONED)

ID NUMBERS - W35-861 thru W35-2008 WP-1 thru WP-21



WASTEX RESEARCH, INC.

DRUM INVENTORY

NOVEMBER 1, 1987

BUILDING 16 & 31

TOTAL NUMBER OF DRUMS IN BUILDINGS - 1, 937 CHASE INVENTORY - 1,650 WASTEX INVENTORY - 287

CHASE INVENTORY:

CLASSIFICATION - HAZARDOUS

CONTNETS - PAINT & INK SLUDGES & SOLIDS, STILL BOTTOMS & CORROSIVES

WASTEX INV. LORY

CONTAINER CONDITION

CONTAINER CONDITION

CONTAINER CONDITION

(UP) FAIR TO GOOD)

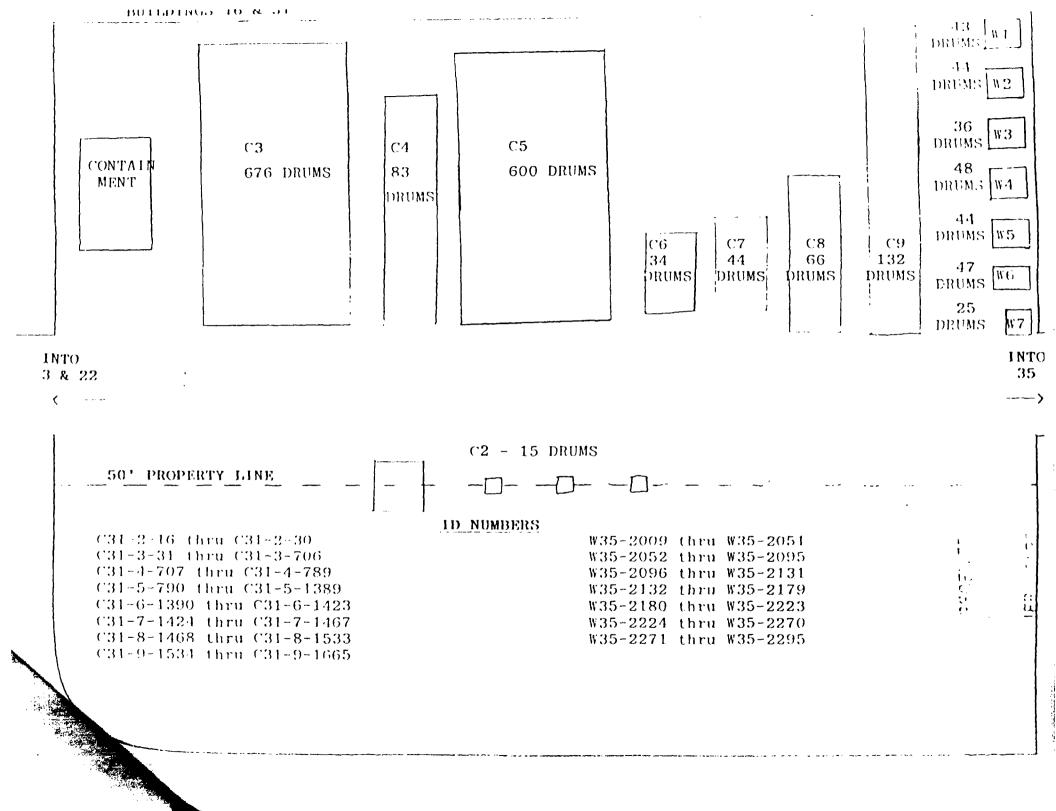
LORD 193 (USED, FAIR TO GOOD)

WASTEX INV. LORY

CONTAINER CONDITION

(UP) FAIR TO GOOD)

ID NUMBERS - U35 2906 INTU V85-2295



WASTEX RESEARCH, INC.

DRUM INVENTORY

NOVEMBER 1, 1987

BUILDING 35

TOTAL NUMBER OF DRUMS IN BUILDING - 546

ALL DRUMS IN BUILDING ARE PART OF THE CHASE INVENTORY

CLASSIFICATION - HAZARDOUS

CONTENTS - PAINT & INK SLUDGES AND SOLIDS

CONTAINER CONDITION - DOT APPROVED - 284 (USED, GOOD CONDITION)

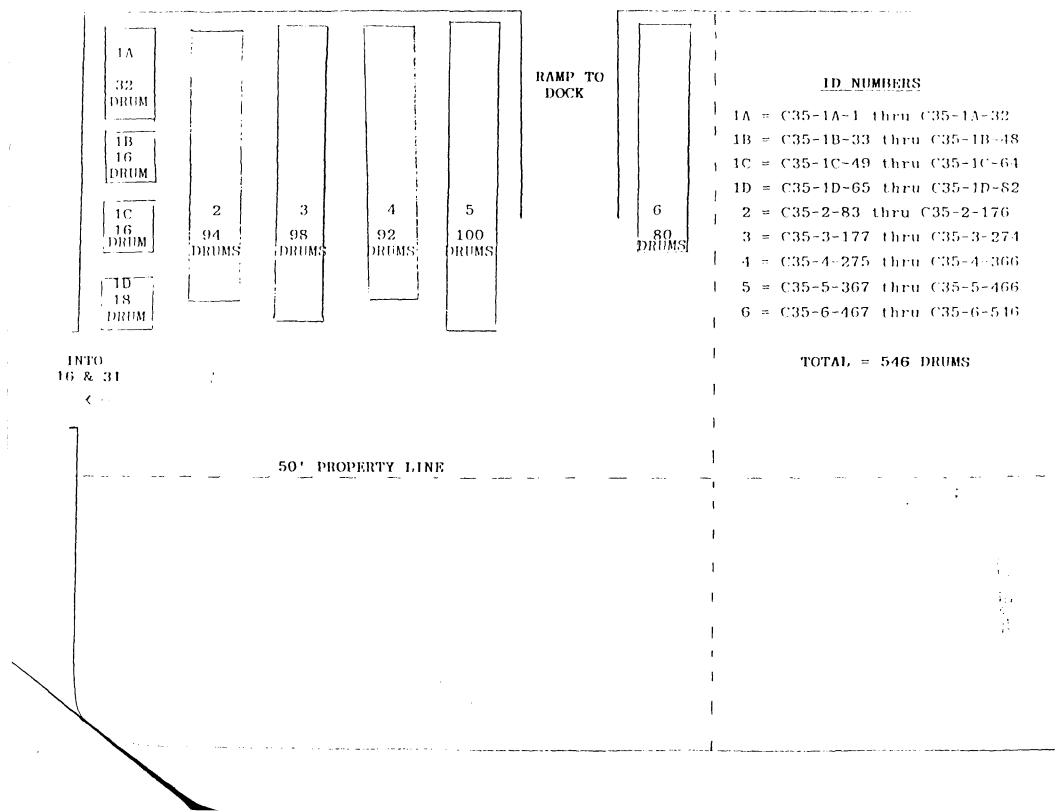
NON-STANDARD - 254 (OPEN HEAD DRUMS)

RECOVERY

DRUM IDENTIFICATION NUMBERS - C35-1 THRU C35-546

ALL WASTES IN BUILDING ARE COMPATABLE





WASTEX RESEARCH, INC. STORAGE TANK INVENTORY OCTOBER 1, 1987

TANK	# DRAWING	# GALLONS	CONTENTS
1	ST-1	15,000	ASPHALT GRADE FUEL
2	ST-2	14,000	ASPHALT GRADE FUEL
3	ST-3	11,000	ASPHALT GRADE FUEL
4	ST-4	6,000	PAINT & INK SLUDGES
5	ST-5	6,000	PAINT & INK SLUDGES
6	ST-6	6,000	PAINT & INK SLUDGES
7	ST-7	11,005	CEMENT KILN FUEL
8	AAT-1	8,000	- ACIDS
9	AAT-3	7 12,000	ASPHALT GRADE FUEL
10	AAT-2	4 9 000	CEMENT KILN FUEL
11	RST-1	19 1901	CEMENT KILN FUEL
12	RST-2	20,000	ASPHALT GRADE FUEL
13	RST-3	18 300.	CEMENT KILN FUEL
14	RST-4	13,000	ASPHALT GRADE FUEL
15	RST-5	19,000	CEMENT KILN FUEL
16	RST-6	8,500	CEMENT KILN FUEL
17	RST-7	8,000	PCB CONTAMINATED FUEL
18	RST-8	10,000	CEMENT KILN FUEL
19	RST-9	10,000	CEMENT KILN FUEL
20	RST-10	9,000	CEMENT KILN FUEL
21	RST-11	3,734	CEMENT KILN FUEL
22	ST-8	9,000	ASPHALT & KILN FUEL
23	ST-9	9,000	ASPHALT & KILN FUEL RECEIVED

1501 ----

Page 2 STORAGE TANK INVENTORY

TANK #	DRAWING #	GALLONS	
24	ST-10	8,000	CONTENTS
25	SL-1	8,000	AMPHALT & KILN FUEL CONTAMINATED WATER
26	SL-2	-0-	
27	SL-3	3,000	41.
PCB-1		5,000	CEMENT KILN FUEL
STORAGE TANK			TOTAL CONTAMINATED FUEL

STORAGE TANK INVENTORY TOTALS:

ASPHALT GRADE FUEL	
	GALLONS
PAINT & INK SLUDGES 18 000	9
ACIDS 18,000	11
8,000	11
PCB CONTAMINATED FIRE	11
CONTAMINATED WATER	
TOTAL IN ALL TANKS	-